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*Attorneys for Defendants Clark County School District,
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Vail Pittman Elementary School*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

HATTIE BLUE, individual and natural parent and
SUSAN HOY as Guardian Ad Litem for J.B., a
minor,

Plaintiffs,

v.

PAMELA SMITH, in her official capacity;
STEPHANIE GARNI, in her officer capacity;
KATHY KONOWALOW, in her official capacity;
PAT SKORKOWSKY, in his official capacity;
VAIL PITTMAN ELEMENTARY SCHOOL;
CLARK COUNTY SCHOOL DISTRICT, a
Political Subdivision of the State of Nevada;
PROGRESSUS THERAPY, LLC, a Foreign
Limited-Liability Company; INVO HOLDINGS,
LLC, a domestic Limited-Liability Company;
PROGRESSUS, INC, a Florida Corporation;
DOES I through X, inclusive; and ROES I through
X, inclusive,

Defendants.

CASE NO. 2:20-CV-00401-GMN-NJK

**STIPULATION AND REQUEST TO
STAY LITIGATION PENDING
SATISFACTION OF SETTLEMENT
TERMS AND EXECUTION OF
SETTLEMENT AGREEMENT**

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By and among counsel for Plaintiffs Hattie Blue and Susan Hoy, Guardian Ad Litem for J.B., a minor, counsel for Defendants Clark County School District (“CCSD”), Stephanie Garni, Kathy Konowalow, Pat Skorkowsky, and Vail Pittman Elementary School, counsel for Defendants Invo Holdings, LLC and Progressus Therapy, LLC, and counsel for Defendant Pamela Smith, (collectively the “Parties”) hereby request that the Court stay this matter while the Parties work on satisfying agreed-upon settlement terms. The Parties state as follows:

1. On October 16, 2020, the Parties reached a preliminary agreement of settlement terms.

2. A stay in this matter will allow the Parties the opportunity to satisfy preliminary terms of the settlement, including finalizing the settlement agreement, and seeking Court approval regarding the Minor’s Compromise, prior to dismissing this matter.

3. The Parties stipulate that this case be stayed and that the deadline for any action required to be taken by any party be tolled until further order of the court.

4. The Parties request that a status check be set for ninety (90) days.

5. This stipulation is made in good faith to allow the Parties to make diligent and sincere efforts to resolve the matter without further involvement for the Court and is not for the purpose of causing any undue delay.

IT IS SO STIPULATED.

DATED this 17th day of November, 2020.

DATED this 17th day of November, 2020.

GREENBERG TRAUIG, LLP

H&P LAW

/s/ Whitney L. Welch-Kirmse
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Attorneys for Plaintiff

*Attorneys for Clark County School District,
 Stephanie Garni, Kathy Konowalow, Pat
 Skorkowsky, and Vail Pittman Elementary School*

DATED this 17th day of November, 2020.

WINSTON & STRAWN, LLP

/s/ Zarouhi Papazyan
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*Attorneys for Defendants Invo Holdings, LLC and
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DATED this 17th day of November, 2020.

LIPSON NEILSON

/s/ Julie Funai
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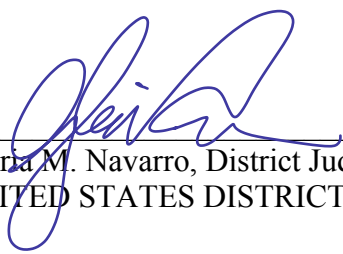
Attorneys for Defendant Pamela Smith

ORDER

In consideration of the stipulation by the Parties, and with good cause appearing,

IT IS SO ORDERED.

DATED this 17 day of November, 2020.



Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT